

The Petitioner in the above-captioned matter, respectfully files this Petition to Perpetuate Testimony of one witness in this district. Pursuant to Federal Rule of Civil Procedure 27(a), and Local Rule 27 for the Western District of Washington, Tacoma, seeks to take the remote deposition by telephone of Jacquetta Carter, or alternatively, to serve written deposition questions upon Jacquetta Carter to record their known testimony, and request production of certain documents and papers, in the interests of justice and avoiding delay, and for other and further relief as the Court deems just and proper. In support, the Petitioner submits Petitioner's Memorandum of Law dated March 5, 2021, which is being filed contemporaneously with this petition, and supporting exhibits,

1 and the condition precedent notice in compliance with Rule 27(a)(2) to the potential adverse party-
2 witness, Jacquetta Carter.

3 This 5th day of March, 2021.

4 CHARLESTON,

5 SOUTH CAROLINA

6 Respectfully submitted,

7 

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